

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT
Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 14-1151

Caption [use short title]

Motion for: Extension of time and to file oversized Brief

Dahiya Law Offices LLC
v.

Debra Kramer as Trustee

Set forth below precise, complete statement of relief sought:

Appellants seeks extension of time, additional
30 days time until August 28, 2014 to file brief
Also, relief sought is to file an oversized brief
with words limit of not more than 28,000 words

MOVING PARTY: Karamvir Dahiya & Dahiya Law Offices

☐ Plaintiff

☐ Defendant

☒ Appellant/Petitioner

☐ Appellee/Respondent

OPPOSING PARTY: Debra Kramer as Trustee

MOVING ATTORNEY: Karamvir Dahiya

[name of attorney, with firm, address, phone number and e-mail]

OPPOSING ATTORNEY: Avrum Rosen, Esq.

Dahiya Law Offices LLC

Law Offices of Avrum J. Rosen

75 Maiden Lane Suite 506, NY 10038

38 New St. Huntington, New York 11743

Tel: 212 766 8000 karam@legalpundit.com

Tel: 631 423 8527 ajrlaw@aol.com

Court-Judge/Agency appealed from: District Court of EDNY--Hon. Judge Dora Irizarry

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

☒ Yes

☐ No (explain):

Opposing counsel's position on motion:

☐ Unopposed

☐ Opposed

☒ Don't Know

Does opposing counsel intend to file a response:

☐ Yes

☐ No

☒ Don't Know

**FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND
INJUNCTIONS PENDING APPEAL:**

Has request for relief been made below?

☐ Yes

☒ No

Has this relief been previously sought in this Court?

☐ Yes

☒ No

Requested return date and explanation of emergency:

Is oral argument on motion requested?

☐ Yes

☒ No

(requests for oral argument will not necessarily be granted)

Has argument date of appeal been set?

☒ Yes

☐ No

If yes, enter date: 07/28/2014

Signature of Moving Attorney:

Date: 07/14/2014

Service by: ☒ CM/ECF

☐ Other

[Attach proof of service]

CASE NO. 14-1151
IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

**DAHIYA LAW OFFICES LLC &
KARAMVIR DAHIYA**

Appellants

--against--

**DEBRA KRAMER, TRUSTEE
ESTATE OF SHAHARA KHAN**

Appellee.

On Appeal from the United States District Court
for the Eastern District of New York

**APPELLANTS' NOTION TO EXTEND TIME FOR FILING APPELLANT'S BRIEF AND JOINT
APPENDIX AND PERMISSION TO FILE OVERSIZED BRIEF**



Karamvir Dahiya
Dahiya Law Offices LLC
75 Maiden Lane Suite 506
New York New York 10038
Telephone: (212) 766 8000

DECLARATION OF KARAMVIR DAHIYA IN SUPPORT OF MOTION

I, Karamvir Dahiya, pro se and on behalf of Dahiya Law Offices LLC (Appellants) respectfully declares as follows:

Pursuant to Federal Rules of Appellate Procedure 26(b), 27, 32 (a) (7) and Local Rule 27.1, Appellants respectfully request to move for a thirty days (30) day extension of time, and including August 27, 2014, in which to file its proposed oversized (28,000 words) Appellant Brief.

Appellant's brief is currently due on July 28, 2014. Appellants have not previously requested any extension of time to file their brief. Appellee's counsel consent is being sought.

The Appellant is a solo practioner and owing to pending professional commitments, an extension of time is sought. The appellant has to prepare in detail, three different applications for asylum relief in pending cases (Amrit Singh, Manjinder Singh, additional documentations for Gurjant Singh), prepare applications for retention, schedules as well as financing plan for the debtor, Van Realty, in a pending Chapter 11 case and do the same in two other chapter 13 cases of Claudette Boot and Mohd. Hassan. Also prepare discovery motion and paperwork in a pending Chapter 7 case (Jacob Pinson) to meet the deadline and do an evidentiary hearing in a chapter 13 case as a special counsel. I have also to arrange for the closing on a property to meet the settlement demands of a chapter 7 trustee. All this has to be done prior to July 27th, 2014.

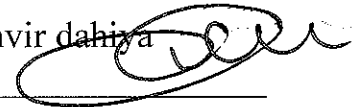
A thirty day extension from July 28, 2014 to August 28th, 2014 for Appellant's brief will enable Appellants to adequately prepare for the brief and in the same time, fulfill his obligations in other courts and other matters. This is counsel's first extension before this Court and will not result in any significant delay.

The Appellant also request permission to file an oversized brief as the issues to be raised in the brief are complex and some of the arguments have no precedential guidance from our Second Circuit Court. The Appellant shall argue among others that the Bankruptcy Courts are not Courts of United States for the purposes of sanctions under 28 U.S.C. §1927; there is no independent entity as Bankruptcy Court, 28 U.S.C. § 151 for exercising inherent powers; appointment of bankruptcy judges violate Appointment Clause; bankruptcy courts cannot decide merits of state based laws and contentions; and there is no immunity to chapter 7 trustees. There are other issues that shall be raised which deals with the protection of the consumer debtors. These issues deals directly with the merits of underlying controversy and necessary for the disposition of the case.

For these reasons, Appellant's respectfully request that his motion be granted and that the appellants be allowed until and including August 27, 2014 in which to file the Appellant's brief. Also request be granted to file an oversize brief of not more than 28,000 words.

Dated: July 14, 2014
New York, New York.

/s/karamvir dahiya



Karamvir Dahiya

Dahiya Law Offices LLC